

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,

Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243

Judge Campbell
Magistrate Judge Frensley

**GUIDEPOST’S MOTION FOR A
PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c), Defendant Guidepost Solutions LLC (“Guidepost”) respectfully moves the Court to issue a protective order in connection with the deposition notice(s) through which Plaintiff seeks to take the deposition of Guidepost pursuant to Fed. R. Civ. P. 30(b)(6) on February 26, 2024.

Because Guidepost’s witness is unavailable on February 26, and the parties have not properly met and conferred about the topics to be covered in and the documents to be produced at the deposition, as is required by Rule 30(b)(6), Guidepost asks that the Court (a) excuse Guidepost from attendance at the February 26 deposition, (b) order the parties to meet and confer in good faith about the topics and document requests included in the deposition notice, and (c) after agreement has been reached on topics and documents, require the parties to agree, in writing, to a date certain for the deposition, at a time and place convenient to all parties. Further, pursuant to Rule 26(c)(3) and Rule 37(a)(5), Guidepost is entitled to its costs and fees incurred in filing this Motion based on Plaintiff’s refusal to meet in good faith and adhere to the Federal and Local Rules.

In support of this Motion, Guidepost relies on the following:

1. Notice of Deposition and Amended Notice of Deposition served on Guidepost (attached as Exhibits 1 and 5 respectively to the Declaration of Scott Klein);
2. Declaration of Scott Klein and the exhibits thereto; and
3. A memorandum of law filed contemporaneously with this Motion.

Pursuant to Local Rule 7.01, Fed. R. Civ. P. 30(b)(6), and as detailed in the Declaration of Mr. Klein, Guidepost's counsel has made numerous attempts to meet and confer with Plaintiff's counsel about issues relating to the 30(b)(6) topics, document requests and depositions date, but they have been unable to reach an agreement.

Respectfully submitted,

/s/ John R. Jacobson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served through the Court's electronic filing system on the following:

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on this 22nd day of February, 2024.

By: /s/ John R. Jacobson